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## FREEMAN, NOOTER & GINSBERG

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CHARLENE RAMOS OFFICE MANAGER

February 3, 2022

Hon. P. Kevin Castel U.S. District Judge U.S. Courthouse 500 Pearl Street New York, NY 10007

> Re: <u>U.S. v. Terry Former</u> 19 CR 781 (PKC)

Dear Judge Castel:

We write to request modification of Mr. Former's conditions of release to permit him to travel from February 11 to February 15, 2022 from his home in Texas to St. Thomas, which, I had to be reminded, is part of the United States. Counsel has the itinerary and the address of the place where he will be staying, as does his pretrial officer in Texas, Matthew Simons.

AUSA Emily Deininger consents to this request on condition that (1) pre-trial agrees; (2) Mr. Former reports to pretrial prior to and after the trip; and (3) Mr. Former provides pretrial with an itinerary.

It is my understanding that Mr. Former's pretrial officer in Texas, Matthew Simons does not object to this request.

Respectfully submitted,

/S/ Louis M. Freeman Louis M. Freeman

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